

Lisa T. Omoto SBN 303830
E-mail: lomoto@faruqilaw.com
FARUQI & FARUQI, LLP
1901 Avenue of the Stars, Suite 1060
Los Angeles, CA 90067
Telephone: 424-256-2884
Facsimile: 424-256-2885

James M. Wilson, Jr. (appearance *pro hac vice*)
FARUQI & FARUQI, LLP
685 Third Avenue, 26th Floor
New York, NY 10017
Telephone: 212-983-9330
Facsimile: 212-983-9331
Email: jwilson@faruqilaw.com

Robert W. Killorin (appearance *pro hac vice*)
FARUQI & FARUQI, LLP
3565 Piedmont Road NE Building Four
Suite 380
Atlanta, GA 30305
Telephone: 404-847-0617
Facsimile: 404-506-9534
Email: rkillorin@faruqilaw.com

Attorneys for Lead Plaintiff
Jeyakumar VS Menon

[additional counsel appear on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JEYAKUMAR VS MENON, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

MAXEON SOLAR TECHNOLOGIES, LTD.,
WILLIAM MULLIGAN, and KAI
STROHBECKE,

Defendants.

Case No.: 3:24-cv-03869-EMC

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER VACATING
INITIAL CASE MANAGEMENT
CONFERENCE**

1 Plaintiff Jeyakumar VS Menon (“Plaintiff”) and Defendants Maxeon Solar Technologies,
 2 Ltd. (“Maxeon”), William Mulligan, and Kai Strohbecke (collectively “Defendants,” and together
 3 with Plaintiff, the “Parties”), by and through their respective undersigned counsel, hereby provide
 4 this Joint Stipulation and Proposed Order Vacating Initial Case Management Conference.

5 WHEREAS, this securities class action is subject to the requirements of the Private
 6 Securities Litigation Reform Act of 1995, Pub. L. No. 104-67, 109 Stat. 737 (1995) (“PSLRA”),
 7 which sets forth specialized procedures for the administration of securities class actions, including
 8 a mandatory stay of proceedings pending determination of any motions to dismiss (15 U.S.C. §
 9 78u-4(b)(3)(B));

10 WHEREAS, pursuant to this Court’s order of dismissal dated April 28, 2025 (ECF No.
 11 90), Plaintiff filed his Second Amended Complaint on May 27, 2025 (the “SAC”) (ECF No. 91);

12 WHEREAS, on June 20, 2025, this Court granted the Parties’ stipulated request for the
 13 following briefing schedule for Defendants’ motion to dismiss the SAC: (1) the deadline for the
 14 motion to dismiss was July 11, 2025; (2) the deadline for Plaintiff’s opposition is August 8, 2025;
 15 and (3) the deadline for Defendants’ reply is August 22, 2025 (ECF No. 97);

16 WHEREAS, on July 11, 2025, Defendants filed a motion to dismiss the SAC (ECF 100);

17 WHEREAS, oral argument for the motion to dismiss is currently scheduled for October
 18 23, 2025 (ECF No. 100);

19 WHEREAS, an initial case management conference is currently scheduled for August 19,
 20 2025 (ECF No. 93);

21 WHEREAS, the Court has, at the Parties’ stipulated request, previously rescheduled the
 22 initial case management conferences that were scheduled in this case during the pendency of
 23 Defendants’ prior motion to dismiss and following the filing of the SAC (ECF Nos. 74, 75, 92);

24 WHEREAS, in light of the mandatory stay of proceedings applicable to cases governed by
 25 the PSLRA, 15 U.S.C. § 78u-4(b)(3)(B), and in consideration of the status of the action, the Parties
 26 agree that good cause exists to vacate the August 19, 2025 Initial Case Management Conference
 27 and all associated ADR deadlines;

1 THEREFORE, in light of the foregoing, the Parties hereby stipulate, and respectfully
2 request the Court to order, as follows:

3 1. Pursuant to Civil L.R. 16-2, the Initial Case Management Conference scheduled
4 for August 19, 2025, along with the associated deadlines under the Federal Rules of Civil
5 Procedure and Local Rules, shall be vacated and all associated ADR Multi-Option Program
6 deadlines shall likewise be deferred until after the Court has rendered a decision on Defendants'
7 motion to dismiss; and

8 2. Nothing in this Joint Stipulation shall be deemed to constitute a waiver of any
9 rights, claims, defenses, objections or arguments that any Party may have with respect to this
10 matter.

11
12 IT IS SO STIPULATED.

13
14 Dated: August 7, 2025

/s/ James M. Wilson, Jr.
James M. Wilson, Jr. (appearance *pro hac*
vice)
FARUQI & FARUQI, LLP
685 Third Avenue, 26th Floor
New York, NY 10017
Telephone: 212-983-9330
Facsimile: 212-983-9331
Email: jwilson@faruqilaw.com

Robert W. Killorin (appearance *pro hac*
vice)
FARUQI & FARUQI, LLP
Suite 380
Atlanta, GA 30305
Telephone: 404-847-0617
Facsimile: 404-506-9534
Email: rkillorin@faruqilaw.com

Lisa T. Omoto (CA SBN 303830)
FARUQI & FARUQI, LLP
1901 Avenue of the Stars, Suite 1060
Los Angeles, CA 90067
Telephone: 424-256-2884
Facsimile: 424-256-2885
E-mail: lomoto@faruqilaw.com

*Attorneys for Lead Plaintiff Jeyakumar
Menon and Lead Counsel for the putative*

class

/s/ Yi-Chin Ho

Yi-Chin Ho (CA SBN 204834)
HUGHES HUBBARD & REED LLP
1999 Avenue of the Stars, 9th Floor
Los Angeles, CA 90071
Telephone: (213) 613-2800
Fax: (213) 613-2950
Email: yi-chin.ho@hugheshubbard.com

*Attorney for Defendants MAXEON SOLAR
TECHNOLOGIES, LTD., WILLIAM
MULLIGAN, and KAI STROHBECKE*

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, James M. Wilson, Jr., attest that concurrence in the filing of this document has been obtained from the other signatories.

Executed on this 7th day of August 2025.


/s/ James M. Wilson, Jr.

James M. Wilson, Jr.

~~PROPOSED~~ ORDER

Pursuant to the above Stipulation, IT IS SO ORDERED.

DATED: 8/6/2025



The Honorable Edward M. Chen
United States District Judge